

EXHIBIT G

From: Daluz, Tobey Marie
Sent: Friday, October 27, 2023 6:04 PM
To: 'SHann@HRMML.com'
Subject: Chester Bankruptcy Information Request for SACC
Attachments: Chester Bankruptcy Information Request of SACC.pdf; SACC Supplemental Request.pdf

Steve:

Thank you for SACC's responses to the information request that was originally transmitted in June of this year. After reviewing the documents provided, we have some follow-up requests and inquiries.

Attached is a list of items that are still needed by the City in connection with the bankruptcy and our goal to accomplish a viable plan of adjustment for the City and its residents. Most of the items were included in the original request. If responsive documents don't exist in the form that was requested, it would be helpful if SACC could note that. Also, the attached list includes a couple of requests that arise from our review of the original information produced. The list also explains the reason for the follow-up request.

I have attached the original communication for your convenience. Let me know if you have any questions or you would like to discuss.

Tobey Marie Daluz
She/Her/Hers

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June 16, 2023

Confidential
Via E-mail

Stormwater Authority of the City of Chester
c/o Steven Hann, Esquire
c/o William G. Roark, Esquire
Hamburg, Rubin, Mullin, Maxwell & Lupin, P.C.
375 Morris Road
P.O. Box 1479
Lansdale, PA 19446

Re: *In re City of Chester, Pennsylvania, No. 22-13032, (E.D. Pa.), Chapter 9 Proceeding*

Dear Counsel:

Ballard Spahr LLP serves as counsel for the City of Chester in connection with its above-referenced chapter 9 bankruptcy case. The primary goal of the bankruptcy case is to formulate a viable plan of adjustment that will effectuate a financial restructuring of the City's obligations and assist Chester in emerging from decades of financial oversight. In furtherance of this goal, we are in the process of detailing all assets and liabilities of the City.

As briefly discussed during our call on Friday, June 16, 2023, included below are the City's requests for information from the Stormwater Authority of the City of Chester (SACC). We are requesting the delivery of these documents at your earliest convenience, and no later than **Friday, June 30, 2023**.

1. Current stormwater fee rate resolution;
2. 2023 adopted Budget;
3. Actual revenues and expenditures by detailed line items for Years 2020 – 2022;
4. Audited financial statements Years 2020-2022;
5. Most recent Capital Improvement Plan;

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6. Multi – year stormwater budget (including capital needs) used to establish the stormwater fee;
7. Listing of all assets owned by SACC;
8. GIS data layers provided as a geodatabase (preferred) and/or shapefile which include the following:
 - a. Storm sewer features (inlets, pipes, catch basins, culverts, detention basins, outfalls, etc.);
 - b. Delineations of City owned vs. private stormwater management facilities (detention basins, infiltration beds, rain gardens, inlets, pipes, etc.);
 - c. Watershed boundaries (streams and/or inlets/outlets);
 - d. Layers showing historical stormwater problems or areas of flooding;
 - e. Any other pertinent layers related to stormwater;
9. The number, type, and description of system assets, including manholes, catch basins, swales, detention basins, outfalls, BMPs, pipes by size and material;
10. The years of acquisition for assets stated in Item 7 (this may be most conveniently available from your public accountants' depreciation work papers);
11. A completed set of Rules and Regulations;
12. Copy of all current regulatory permits governing the system, including MS4 and/or other NPDES Permits;
13. Current Pollution Reduction Plan;
14. List of all projects completed in the current Pollution Reduction Plan;
15. Long Term Control Plan that covers assets owned by SACC, if applicable;
16. Any DEP/EPA violation records and/or inspection records/reports;
17. Reports, studies, maintenance records, and other available documents to understand the type, size and location of infrastructure needs, flooding problems, etc.; and

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18. Capital Improvement Plan projects currently under construction (or planned to be bid this year);

We are happy to discuss the establishment of a share file for the most efficient transmission of the documents. Please let me know if you have any questions.

Sincerely,

Tobey M. Daluz

Tobey M. Daluz

TMD/can

SUPPLEMENTAL INFORMATION REQUEST

Document(s)	Reason
<p>1. GIS data layers provided as a geodatabase (preferred) and/or shapefile which include the following:</p> <p style="padding-left: 40px;">a. Existing Storm Pipe summary and 'Ph2 Proposed Storm Pipe Summary GIS or excel files;</p> <p style="padding-left: 40px;">b. Storm sewer features (pipes, culverts, detention basins, outfalls, etc.);</p> <p style="padding-left: 40px;">c. Delineations of city owned vs. private stormwater management facilities (detention basins, infiltration beds, rain gardens, inlets, pipes, etc.).</p>	<p>Data was received for catch basins. No storm sewer pipe data has been received.</p>
<p>2. The number, type, and description of system assets, including manholes, swales, detention basins, outfalls, BMPs, pipes by size and material.</p>	<p>Data was received for catch basins. Not needed if we receive the GIS data in 1 above.</p>
<p>3. Asset Depreciation Schedule in Microsoft Excel for all assets.</p>	<p>SACC likely prepares for its auditor.</p>
<p>4. Capital Improvement Plans (CIP) for current and future projects.</p>	<p>Review of documents provides a basis for concluding that there is a current CIP which we did not receive. For example, a historic CIP was received (that CIP appears to be a 5-yr CIP associated with years 2018-2022, with projects scheduled for completion by 2021).</p>
<p>5. Multi-year budget.</p>	<p>Is there a 5-year budget beginning July 1, 2023? We received the 5-year budget associated with the 2018-2022 CIP, the fiscal year 2023 budget, and audited financial statements for years ending 2019, 2020, and 2021.</p>

6. Operation and maintenance (O&M) records documenting labor and material costs needed to maintain catch basins, basins, and other stormwater BMPs.	None of the budget or audit documents received clearly identify annual O&M expense associated with maintenance of SACC assets.
7. Regulatory permits governing the system.	Received approved NPDES General Permit. Received MS4 Annual Progress Report for Years 2 & 3 (dated 2016). Are there reports for current MS4 compliance?
8. Pollutant Reduction Plan (PRP) associated with current MS4 Permit and list of completed PRP projects.	We received the PRP dated July 2017.
9. Historic Flooding Data/Reports, Areas of concern regarding flooding	Nothing received.
10. Alternatives Analysis and PENNVEST Second Opinion review for Veterans Memorial Park (VMP) project.	Limited information related to the VMP project was provided except for a conceptual sketch, construction drawings, 2017 <i>Project and Green Infrastructure Feasibility Evaluation Preliminary Report</i> , and the project objective summary included in the "Project Information" document (prepared by HDR).